

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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JUN 23 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Deployment of Wireline Services	)	CC Docket No. 98-147
Offering Advanced Telecommunications	)	
Capability	)	
	)	
Implementation of the Local	)	CC Docket No. 96-98
Competition Provisions of the	)	
Telecommunications Act of 1996	)	
	)	
Applications for Consent to the	)	CC Docket No. 98-141
Transfer of Control of Licenses and	)	
Section 214 Authorizations from	)	
Ameritech Corporation, Transferor	)	
to SBC Communications, Inc., Transferee	)	
	)	
Common Carrier Bureau and Office of	)	NSD-L-48
Engineering and Technology Announce	)	DA 00-891
Public Forum on Competitive Access	)	
to Next-Generation Remote Terminals	)	

COMMENTS OF GTE

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**COMMENTS OF GTE**

GTE Service Corporation and its affiliated domestic communications companies<sup>1</sup> ("GTE") respectfully submit their Comments on the Petition of the Association for Local Telecommunications Services ("ALTS") for Declaratory

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<sup>1</sup> GTE Alaska, Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., GTE West Coast Incorporated, and Contel of the South, Inc.

Ruling on Broadband Loop Provisioning.<sup>2</sup> ALTS requests “that the Commission clarify, interpret and modify its rules governing crucial aspects of loop provisioning by incumbent local exchange carriers.”<sup>3</sup> As discussed below, the Petition is procedurally flawed, lacks merit, and should be dismissed or denied.

## **I. INTRODUCTION AND SUMMARY**

The ALTS petition presents a confusing array of overlapping and subtly varying demands, making it hard to determine exactly what the association is asking the Commission to do. For example, the statement of relief sought in their summary differs from that discussed in the text of the pleading, which in turn deviates from their conclusion as well as the items noted in the Commission's Public Notice. While addressing each of their individual requests is thus next to impossible, no such comprehensive response is necessary. Taken as a whole, the petition is so fatally flawed, both procedurally and substantively, that it merits dismissal or denial in its entirety.

From a procedural standpoint, the petition is defective for three reasons. First, it is largely duplicative of existing Commission dockets. For example, much of the petition is a diatribe against SBC's Project Pronto – but the complex issues associated with access to remote terminals already are being dealt with in the context of the SBC/Ameritech merger docket and a recent public forum.

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<sup>2</sup> Association for Local Telecommunications Services Petition for Declaratory Ruling: Broadband Loop Provisioning, DA 00-1141 (filed May 17, 2000) (“Petition”).

<sup>3</sup> Petition at 1.

Likewise, several aspects of the relief sought by ALTS are already before the Commission in requests for reconsideration of the *Line Sharing Order*. Second, to the extent the petition goes beyond other pending proceedings, it asks for fundamental modifications or additions to the Commission's rules, not mere clarification of current requirements. Such relief, of course, cannot be granted through a declaratory ruling. Third, and relatedly, ALTS seeks to overturn certain rulings made in the *Line Sharing* and *UNE Remand* orders long after the time to seek reconsideration of those decisions has passed.

Even if these procedural infirmities could be overlooked, the petition is substantively unfounded. It is based almost entirely on vague and unsupported allegations of discrimination or other misconduct. Such allegations, if they could be proven, are best dealt with through the complaint process; they certainly can not form the basis for new, sweeping, industry-wide rules. In addition, ALTS ignores the fact that ILECs serving nearly two-thirds of the nation's access lines soon will be required to provide advanced services through a separate affiliate – a development that the Commission has found will prevent discrimination. With so much of the ILEC industry subject to this additional safeguard, ALTS abjectly has failed to demonstrate the need for still further burdensome obligations. Finally, in many respects, the rules sought by ALTS – for example, requiring all ILECs to provide electronic access to loop qualification information – would violate the Act's parity standard. As the Eighth Circuit has made clear, ILECs must treat CLECs as well as they treat themselves, but they cannot be

compelled to give CLECs superior or higher quality access to facilities, services, and information. The relief sought in the petition consequently must be denied.

## **II. THE ALTS PETITION IS PROCEDURALLY FLAWED AND WHOLLY UNNECESSARY.**

The ALTS Petition suffers from a number of procedural flaws. Most notably, much of the ground covered by the Petition is already being considered by the Commission in other proceedings. For example, ALTS frequently alleges that SBC's Project Pronto network redesign, which deploys digital loop carrier systems in remote terminals, is placing CLECs at a disadvantage. However, the Commission already is considering complaints raised by ALTS members about Project Pronto,<sup>4</sup> having solicited a round of comments and conducted a public forum. Similarly, ALTS asks the Commission to hold that loop conditioning charges must adhere to TELRIC pricing principles and that ILECs must provide any type of loop to a CLEC providing multiple telecommunications services. But these issues already are before the Commission in the Line Sharing proceeding. Conducting yet another proceeding on these matters would be a waste of the Commission's and parties' resources.

In addition, ALTS attempts to disguise untimely requests for fundamental reconsideration of final, non-appealable Commission rules as mere requests for

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<sup>4</sup> *Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from Ameritech Corporation, Transferor to SBC Communications, Inc., Transferee*, CC Docket No. 98-141; *Common Carrier Bureau and Office of Engineering and Technology Announce Public Forum on Competitive Access to Next-Generation Remote Terminals*, NSD-L-48, DA 00-891.

clarification.<sup>5</sup> For example, ALTS asks the Commission to “clarify that as a matter of federal law, ILECs must provide alternatives to DLC-served loops.”<sup>6</sup> This is simply an improper request for reconsideration of the *Line Sharing Order*.<sup>7</sup> A declaratory ruling of the magnitude requested by ALTS would constitute unlawful retroactive rulemaking, not mere “clarification.”<sup>8</sup>

Furthermore, ALTS makes several situation-specific allegations of discriminatory conduct that are appropriately raised in a complaint proceeding, not in a request for rules of industry-wide applicability. In this regard, ALTS alleges (without providing the kind of factual support that is needed to determine whether any violation has occurred) that “ILEC have taken literally months to

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<sup>5</sup> Even ALTS recognizes that its petition rests on flawed procedural grounds: “Should the Commission deem it procedurally necessary, however, the limited number of rule modifications suggested in this petition could alternatively be implemented by means of an NPRM.” Petition at 3 n.4.

<sup>6</sup> Petition at 11.

<sup>7</sup> “[T]he incumbent LEC is not restrained, in the course of normal loop plant maintenance and improvement activities, from migrating customers from copper to fiber loop facilities.” *In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, Third Report and Order, FCC 99-355, ¶ 80 (rel. Dec. 9, 1999) (“Line Sharing Order”).

<sup>8</sup> See, e.g., *AT&T v. Federal Communications Commission*, 974 F.2d 1351 (D.C. Cir. 1992). The Administrative Procedure Act and the Commission’s rules set forth the standard for declaratory rulings. The APA authorizes an agency to “issue a declaratory order to terminate a controversy or remove uncertainty.” 5 U.S.C. § 554(e). Pursuant to this statutory authorization, the Commission’s rules provide that “[t]he Commission may, in accordance with section 5(d) of the Administrative Procedure Act, on motion or on its own motion issue a declaratory ruling terminating a controversy or removing uncertainty.” 47 C. F.R. § 1.2. The ALTS Petition presents no controversy or uncertainty.

remove loop devices when requested”<sup>9</sup> and that “ILECs provide better [loop provisioning] to themselves than to CLECs because *they want to*, and because *they can*.”<sup>10</sup> More specifically, ALTS complains of Bell Atlantic’s provisioning of CLEC special access circuits.<sup>11</sup> These unsupported allegations cannot properly form the basis for sweeping, industry-wide rules.

Finally, even if the ALTS Petition were procedurally proper, it has utterly failed to show that there is any need for Commission action. ALTS’s assertions of widespread discriminatory conduct by ILECs become even less convincing when one considers that, in the near future, ILECs serving nearly two-thirds of the nation’s access lines will be providing advanced services through a separate affiliate.<sup>12</sup> As the Commission has found, “an advanced services separate affiliate will provide a structural mechanism to ensure that competing providers of advanced services receive effective, nondiscriminatory access to the facilities and services of the merged firm’s incumbent LECs that are necessary to provide

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<sup>9</sup> Petition at 28.

<sup>10</sup> *Id.* at 24.

<sup>11</sup> *See id.* at 17-18.

<sup>12</sup> *See Application of Ameritech Corp., Transferor, and SBC Communications Inc., Transferee*, CC Docket No. 98-141, Memorandum Opinion and Order, FCC 99-279, ¶ 363 (rel. Oct. 8, 1999) (“SBC/Ameritech Order”); *GTE Corp., Transferor, and Bell Atlantic Corporation, Transferee For Consent to Transfer of Control*, Memorandum Opinion and Order, CC Docket No. 98-184, FCC 00-221, ¶ 260 (rel. June 16, 2000) (“Bell Atlantic/GTE Order”).



advanced services.”<sup>13</sup> In light of this layer of protection (which ALTS nowhere even mentions), additional federal regulation would be superfluous.

**III. ILECS ALREADY PROVIDE VOICE-GRADE AND HIGH-CAPACITY LOOPS ON AN UNBUNDLED AND NONDISCRIMINATORY BASIS.**

Aside from the procedural deficiencies of the ALTS Petition, GTE strongly disagrees with the substance of ALTS’s complaints and its characterization of ILECs’ conduct. ALTS claims that the ability of CLECs to obtain loops is “encumbered or precluded by delays or arcane ILEC processes.”<sup>14</sup> To address this point, ALTS seeks the following rulings: (1) “ILECs must provision voice-grade and high-capacity loops within an interval reasonably calculated to mirror the interval ILECs presently provide to themselves”<sup>15</sup> and CLECs should also be able “to place loop orders while the ILEC prepares the collocation facilities, in order that the loops are installed when the cage is ‘lit’”<sup>16</sup>; (2) ILECs must “provide any type of loop to a CLEC providing one or multiple telecommunications services”;<sup>17</sup> (3) “the Commission should clarify that as a matter of federal law, ILECs must provide alternatives to DLC-served loops.”<sup>18</sup> and (4) “CLECs should

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<sup>13</sup> SBC/Ameritech Order, ¶ 363.

<sup>14</sup> Petition at 8.

<sup>15</sup> *Id.* at 8.

<sup>16</sup> *Id.* at 10.

<sup>17</sup> *Id.* at 8.

<sup>18</sup> *Id.* at 11.

be able first to learn whether a particular central office is served by high-capacity transmission facilities.”<sup>19</sup> None of these rulings is necessary or appropriate.

High-Capacity Loop Provisioning. First, ALTS’s request for delivery of high-capacity loops within the same interval as ILECs provide loops to themselves raises no competitive issue for the Commission to consider. GTE already provides interconnection and all unbundled network elements, including high-capacity loops, on a non-discriminatory basis. Adopting a maximum interval for the provision of high-capacity UNE loops, as ALTS requests,<sup>20</sup> would be impractical given substantial variations in facilities availability among different central offices. Such an arbitrary interval also would contradict the parity standard set by the Communications Act.<sup>21</sup>

Similarly, ALTS’s request concurrently to order high-capacity loops and collocation ignores the realities of provisioning such facilities. Before GTE can provide a high-capacity transmission facility to the CLEC’s point of collocation, the CLEC cross-connect facility connecting the transmission equipment to GTE’s cross-connect bay/frame must be in place. Providing CLECs with an estimated assignment location for the CLEC cross-connect facility based on the GTE work order would not be useful because this preliminary assignment information is likely to change upon actual implementation. A change in the assignment information would cause a CLEC order relying on the preliminary assignment

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<sup>19</sup> *Id.* at 10.

<sup>20</sup> *Id.* at 3.

<sup>21</sup> See 47 U.S.C. § 251(c)(3).

information to be terminated to an incorrect location or returned to the CLEC for resubmission. Thus, it is not a "needless technicality to require a precise termination point"<sup>22</sup> prior to placing a facilities order within GTE's system. What ALTS is asking for is impractical.

Furthermore, although ALTS may be unhappy with the amount of time required to implement CLEC loops orders, GTE is providing that service as quickly as it is able.<sup>23</sup> GTE's ordering system will not accept orders that predate completion of the connection of the cross-connect facility from the CLEC's collocation cage to GTE's cross-connect bay/frame. It is designed in this manner because requiring the collocated cage to be complete before accepting a loop order eliminates duplicative work and confusion. The separate groups of GTE employees who set up the collocation arrangement and who provide the DS-1 loop must work according to the same uniform schedule or incur delays and loss of productivity.

Line Sharing. The ALTS demand that ILECs provide any type of loop to a CLEC providing one or multiple telecommunications services<sup>24</sup> has already been addressed in the Commission's Line Sharing proceeding. The line sharing rule clearly states that the line sharing obligation includes only lines on which the

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<sup>22</sup> Petition at 9.

<sup>23</sup> Once collocation is established, there is parity in the time interval for provision of transport and dark fiber.

<sup>24</sup> ALTS makes a related request that ILECs be required "to provide entire loops to CLECs providing integrated voice and data services over a shared line." Petition at 3. This request similarly attempts to reintroduce issues settled in the Line Sharing proceeding.

ILEC itself provides voice services.<sup>25</sup> Moreover, this exact same issue is already before the Commission on requests for reconsideration of the *Line Sharing Order*.<sup>26</sup>

Copper Loops. Similarly, ALTS's request that ILECs provide alternatives to DLC-served loops is more germane to another Commission proceeding. ALTS states that this relief is needed because of alleged concerns with SBC's Project Pronto network redesign. The Commission, of course already has developed a record on remote terminal access issues in that docket. Furthermore, as a general matter, the Commission properly has held that ILECs are permitted to upgrade their loop plant by replacing copper with fiber without permission from their competitors: "[I]ncumbent LECs may maintain control over the loop."<sup>27</sup>

Facilities Information. Finally, there is no need for a rule requiring ILECs to disclose what facilities are available at each central office. CLECs are provided with the capacity their services require, negating the need for ILECs to provide capacity information in the absence of any planned use. CLECs are

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<sup>25</sup> "An incumbent LEC shall only provide a requesting carrier with access to the high frequency portion of the loop if the incumbent LEC is providing, and continues to provide, analog circuit switched voiceband services on the particular loop for which the requesting carrier seeks access." 47 C.F.R. § 51.319(h)(3).

<sup>26</sup> *In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, Petition of AT&T Corp. for Expedited Clarification or, in the Alternative, for Reconsideration, filed Feb. 9, 2000; Petition for Clarification of MCI WorldCom, filed Feb. 9, 2000.

<sup>27</sup> Line Sharing Order, Executive Summary.

given the opportunity to provide their GTE Account Manager with a local service forecast by central office, including the number of lines, products, and services needed. This forecast is reviewed by the Account Manager and shared with Network Planning personnel. Network planning personnel incorporate these facilities requirements into plans where GTE is responsible to provide facilities in accordance with FCC rules.

#### **IV. THE COMMISSION'S RULES REGARDING PROVISION OF SUBLOOPS ARE CLEAR.**

In addition to the loop-related requests discussed above, ALTS "seeks a Commission ruling that reiterates the ILEC's obligation to provide subloops to any carrier, for any service, on a just, timely and nondiscriminatory basis."<sup>28</sup> No such ruling is warranted. The subloop unbundling rules established in the *UNE Remand Order* do not require further elucidation, and ALTS has the ability to address any perceived violation of these rules through enforcement proceedings.

In accordance with existing rules, GTE already provides CLECs access to subloops at any technically feasible point in a nondiscriminatory manner. Additionally, GTE has agreed, as a condition of its pending merger with Bell Atlantic, to hire an independent auditor, approved by the Commission, to monitor the merged company's compliance with the Commission's UNE and line sharing requirements for any four consecutive full months after the close of the merger.<sup>29</sup>

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<sup>28</sup> Petition at 13.

<sup>29</sup> See Bell Atlantic/GTE Order, ¶ 296.

These audits should allay any concerns about GTE's compliance with existing UNE and line sharing rules.

To the extent ALTS asks the Commission to require ILECs to provide access "in a manner that will support provision of multiple services over a shared line,"<sup>30</sup> this request is analogous to their request for access to the entire loop for provision of integrated voice and data services over a shared line and should be similarly denied. As acknowledged by the petitioner itself, the line sharing "rules do not [ ] ensure that a CLEC may line share for itself."<sup>31</sup> ALTS's request for reconsideration of this decision is therefore untimely and inappropriate.

**V. THERE IS NO BASIS FOR MANDATING DISCLOSURE OF SPECIAL ACCESS LOOP INFORMATION.**

After acknowledging that CLECs often use special access circuits instead of UNE loops, ALTS demands that ILECs provide loop make-up information for special access circuits just as they do for unbundled loops.<sup>32</sup> This request is unnecessary and incorrectly attempts to extend to a service rules that apply only to unbundled facilities.

ILECs are responsible for designing and controlling the facilities used to provide special access service. After a CLEC selects special access from an ILEC's tariff, the ILEC designs the service based on a description of the CLEC's

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<sup>30</sup> Petition at 3.

<sup>31</sup> *Id.* at 14.

<sup>32</sup> *See id.* at 19.

service needs and conditions the loop as necessary.<sup>33</sup> Thus, CLECs have no need for loop make-up information for special access circuits. In contrast, a CLEC relying on UNE loops needs loop make-up information because it must design and control the loop itself. ALTS has provided no basis for extending the loop information rules beyond their current scope and no basis exists.

**VI. IMPOSING A FEDERAL DEADLINE FOR ELECTRONIC PROVISION OF LOOP INFORMATION WOULD VIOLATE THE ACT'S PARITY STANDARD.**

ALTS's request for a "federal deadline by which all ILEC OSS interfaces must electronically provide all loop information"<sup>34</sup> is misguided. The *UNE Remand Order* determined that OSS is subject to unbundling requirements, but refused to set quantitative or qualitative performance standards to demonstrate parity under the rules.<sup>35</sup> The UNE parity standard, to which ILECs adhere, does not require GTE to provide its competitors with superior service.<sup>36</sup> GTE does not electronically provide itself with loop information through its OSS interface and

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<sup>33</sup> As illustrated by the attached pages from GTE's special access tariff, CLECs have access to all information needed to order special access services.

<sup>34</sup> Petition at 4.

<sup>35</sup> UNE Remand Order, ¶ 437.

<sup>36</sup> Section 251(c)(2)(C) of the Act plainly "does not requires incumbent LECs to provide its competitors with superior quality interconnection ... [or] mandate that requesting carriers receive superior quality access to network elements upon demand." See *Iowa Utilities Board v. FCC*, 120 F.3d 753, 812 (8<sup>th</sup> Cir. 1997).

thus is not required to overhaul its system for the benefit of CLECs.<sup>37</sup>

Nonetheless, on May 17, 2000, GTE made available to CLECs its Mechanized Loop Qualification and Verification program. In providing loop qualification information to CLECs for qualification of a loop prior to placing an order, GTE is providing CLECs a service it does not provide itself.

## **VII. FEDERAL PERFORMANCE DEADLINES FOR LOOP PROVISIONING ARE INAPPROPRIATE.**

ALTS's request for federal standards for the provision of loops and loop information is inappropriate both procedurally and substantively. As a procedural matter, such standards cannot be adopted through a declaratory ruling; they must be developed, if at all, through a rulemaking. In any event, regardless of this fatal procedural infirmity, federal provisioning deadlines are impracticable. A national standard for loop provisioning could not be established due to inherent and obvious variations in networks. Providing access to any type of loop requires a number of steps, the time for which varies by central office and facilities available.<sup>38</sup> Such differences are particularly acute for xDSL-capable loops. It is impossible to set a single federal standard to

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<sup>37</sup> GTE does not internally pre-qualify loops for ADSL service based on loop information. Rather, GTE pre-qualifies loops for ADSL based on loop length alone and does not perform the qualification functions on a loop until a firm customer order or skeleton order (an order without a due date) is created.

<sup>38</sup> Similarly, ILECs provide loop de-conditioning as quickly as circumstances permit. Loop de-conditioning is a labor-intensive process that relies on a limited maintenance workforce to physically remove items from the copper line. Notwithstanding, GTE's standard provisioning interval for ADSL services requiring conditioned loops is eleven business days. Thus, additional oversight of this process by the Commission is not necessary.



fit all situations; doing so would simply assure that ILECs would be unable to comply in many cases.

Finally, a federal provisioning deadline would be contrary to the Act. The legal standard for loop provisioning, with which ILECs comply, continues to be parity. Loop provisioning intervals vary within the parity standard because they are specific to their circumstances.

#### **VIII. RECOVERY OF LOOP DE-CONDITIONING COSTS IS CONSISTENT WITH TELRIC.**

Pricing of loop de-conditioning charges already has been raised by various CLECs in their petitions for reconsideration of the *Line Sharing Order*. In its comments on the those petitions, GTE demonstrated that the Commission cannot exempt CLECs from bearing the cost of requested loop conditioning.<sup>39</sup> Moreover, the obligation of CLECs to pay for loop conditioning is entirely consistent with forward-looking cost methodologies.

ALTS complains of the prohibitive cost of the de-conditioning service, but its proposed solution – forcing ILECs to absorb the cost – is neither reasonable nor equitable. ILECs incur real costs in satisfying CLECs' requests to condition loops, and they do not recover those costs through existing retail or wholesale rates. Consistent with the long-standing principle that costs should be borne by

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<sup>39</sup> *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Comments and Opposition of GTE, 7 (filed Mar. 22, 2000).

the cost causer, CLECs must continue to pay ILECs for all costs reasonably incurred in conditioning loops.<sup>40</sup>

**IX. FEDERAL PENALTIES FOR NON-COMPLIANCE WOULD BE GRATUITOUS.**

ALTS asks for “self-executing monetary penalties for ILEC failure to comply with the provisioning rules established in this proceeding.”<sup>41</sup> This request is gratuitous. Interconnection agreements and state commissions already have penalties in place to address any ILEC failure to comply with loop provisioning rules. There is no need for an additional layer of federal penalties.

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<sup>40</sup> Nonetheless, as a condition of its merger with Bell Atlantic, GTE has agreed not to charge CLECs for conditioning loops of less than 12,000 feet. See Bell Atlantic/GTE Order, ¶ 277.

<sup>41</sup> Petition at 31.

**X. CONCLUSION**

The ALTS Petition is procedurally improper, duplicates numerous other Commission proceedings, and is substantively meritless. It should be dismissed or denied.

Respectfully submitted,

GTE SERVICE CORPORATION AND ITS AFFILIATED  
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## FACILITIES FOR INTERSTATE ACCESS

5. SPECIAL ACCESS (Cont'd)5.4 Description of Supplemental Features (Cont'd)5.4.2 Conditioning Arrangements - Data

Data conditioning, when utilized in conjunction with effective four-wire Voiceband transmission facilities, improves the characteristics of these facilities. These improved characteristics are not represented to apply to the entire end to end facility of the customer, but only to that portion of the facility provided by the Telephone Company.

There are three types of data conditioning: Type C, Type C-Improved and Type DA. Type C and Type C-Improved conditioning control attenuation distortion and envelope delay distortion. Type DA controls the signal to C-notched noise ratio and intermodulation distortion. Type C and Type DA conditioning may be combined on the same circuit. Type C-Improved and Type DA conditioning may be combined on the same circuit.

Data conditioning is charged for on a per Special Access line basis. The parameters listed for each type of data conditioning apply from two or more CDLs located within the Telephone Company serving area. Conditioning parameters apply to each end of a two-point circuit. For multipoint circuits, the conditioning parameters apply from any CDL to either the point of interface at another CDL or the first Telephone Company bridging point depending on the circuit configuration. These parameters are not applicable to High Capacity or Wideband Analog points of interface, because there is no voice frequency test access point. In these instances the data conditioning parameters apply to the last telephone company voice frequency test access point before the High Capacity or Wideband Analog point of interface.

(A) Type C (USOC - X1CPT)

Type C conditioning of Voiceband facilities provides a facility with the following transmission parameters enhanced to meet the values specified for Type C conditioning in Section 7000 of the GTE Technical Interface Reference Manual in addition to the standard parameters for Voiceband circuits.

- (1) Attenuation distortion with reference to 1004 Hz.
- (2) Envelope delay distortion.

(B) Type C-Improved

Type C-Improved conditioning of Voiceband facilities provides a facility with the following transmission parameters enhanced to meet the values specified for Type C conditioning in Section 7000 of the GTE Technical Interface Reference Manual in addition to the standard parameters for Voiceband circuits.

- (1) Improved attenuation distortion with reference to 1004 Hz.  
(USOC - UHW)
- (2) Improved envelope delay distortion. (USOC - UHY)

The customer may choose to order Improved Attenuation Distortion or Improved (T) Envelope Delay Distortion or both (USOC - XCECM) configurations. The rates specified for Type C-Improved conditioning, Section 5.7.2(B), will apply regardless of the configuration specified.

Director - Tariffs  
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Issued: April 15, 1993

FACILITIES FOR INTERSTATE ACCESS

5. SPECIAL ACCESS (Cont'd)

5.4 Description of Supplemental Features (Cont'd)

5.4.2 Conditioning Arrangements - Data (Cont'd)

(C) Type DA (USOC - XDCPT)

(Z)

Type DA conditioning of Voiceband facilities provides a facility with the following transmission parameter enhanced to meet the values specified for Type DA conditioning in Section 7000 of the GTE Technical Interface Reference Manual in addition to the standard parameters for voiceband circuits.

- (1) Signal to C-notched noise ratio.
- (2) Nonlinear signal to second order distortion.
- (3) Nonlinear signal to third order distortion.

(This page filed under Transmittal No. 782.)

(T)  
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Issued: June 14, 1989

## FACILITIES FOR INTERSTATE ACCESS

5. SPECIAL ACCESS (Cont'd)5.4 Description of Supplemental Features (Cont'd)5.4.3 Conditioning - Program Audio(A) Stereo Conditioning (USOC - XSC) (T)

Provides the option of two radio program facilities which are identical in all transmission characteristics. Two Program Audio facilities are required to provide this Supplemental Feature. This feature is

normally used only with Program Audio 50 to 15000 Hz facilities. Stereo Conditioning is charged on a per occurrence basis. (T)

(B) Zero Loss (USOC - XZB)

Conditioning of Program Audio facilities to provide zero loss at 1000 Hz test frequency. Zero Loss is charged on a per Special Access Line basis. (T)

5.4.4 Signaling Arrangements (USOC - OS+; XSSLR)

Signaling arrangements, when furnished with Voiceband transmission facilities, enable the facilities to accommodate standard telecommunications signaling protocols. Signaling arrangements provide for the conversion of one signaling method to another signaling method and/or extension of a signaling method at customer and Telephone Company interfaces and enables the transmission facilities to accommodate signaling transmission. Signaling arrangements are available with Voiceband transmission facilities to enable transmission of requested signaling formats. The third and fourth protocol characters of the Network Channel Interface (NCI) and Secondary Network Channel Interface (SEC NCI) codes as indicated on the customer's order, reflect signaling activity. Typical protocol characters contained in the NCI or SEC NCI codes that designate signaling arrangements are: AB, AC, DS, DX, DY, EA, EB, EC, EX, GO, GS, LA, LB, LC, LO, LR, LS, NO, RV and SF.

The customer identified NCI and SEC NCI codes will be considered the customer's request for signaling. The Telephone Company will endeavor to provide the specific signaling protocols requested by the customer. In those cases where facilities and equipment are not available to meet the customer's specific requests, the Telephone Company will provide the customer acceptable alternate protocols. Sections 3300, 6000 and 7000 of the GTE Technical Interface Reference Manual provide detailed technical descriptions of the signaling protocols normally available with each service offering. To properly provision SF signaling, when associated signaling code, is DS (PCM), additional information of SF requirements (loop signaling type DX/E&M or ringdown) must accompany the customer's order.

Signaling arrangement charges apply whenever interfaces at the customer premises or at the customer's Telephone Company serving wire center require a signaling arrangement other than those provided with the Terminating Options in 5.3.2 preceding. Signaling Arrangements will be charged on a per SAL basis. Specifically, a signaling charge applies if the signaling protocol characters in the NCI and the SEC NCI fields are different and include one of the following codes: RV, EX, SF, DX, DY, DS, AB.

(T)

Director - Tariffs  
West Airfield Drive, D/FW Airport, Texas 75261


## CERTIFICATE OF SERVICE

I, Robin Walker, hereby certify that on this 23rd day of June, 2000, I caused copies of the foregoing Comments of GTE to be sent via hand-delivery to:

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